

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT- ATHLETE CONCUSSION INJURY LITIGATION)	MDL No. 2492
)	Master Docket No. 1:13-cv-09116
)	This Document Relates to All Cases
)	Judge John Z. Lee
)	Magistrate Judge Geraldine Soat Brown

AGREED MOTION FOR AN EXTENSION OF TIME

The National Collegiate Athletic Association (the “NCAA”), by its counsel, respectfully requests an extension of time until June 22, 2015, for the submission of its response to the First Objections to Plaintiffs’ Motion for Preliminary Approval of Class Settlement (the “First Objections”) filed by Anthony Nichols (“Nichols”) on May 27, 2015. In support of this motion, the NCAA states as follows:

1. On May 14, 2015, the Court struck *sua sponte* the Motion for Leave to File Instanter an Enlarged Response to Plaintiffs’ Motion for Preliminary Approval of Class Settlement filed by objector Nichols on May 8, 2015. See Minute Entry (Dkt. #182). The Court then instructed Nichols to file two separate memoranda setting forth his objections to the proposed Settlement. See id.
2. Nichols filed the First Objections on May 27, 2015. See Nichols’ First Objections to Pls.’ Mot. for Preliminary Approval of Class Settlement (Dkt. #183). The First Objections raise eight separate arguments attacking the proposed Settlement. See id.
3. Per the Court’s May 14, 2015 Minute Entry, any response by the NCAA to Nichols’ First Objections is due on June 10, 2015. See Minute Entry (Dkt. #182).

4. Counsel for the NCAA have been working diligently to respond to Nichols' First Objections. In order to avoid undue repetition, however, between the response being submitted by Plaintiffs and the response to be submitted by the NCAA and also in light of the impending wedding of the undersigned, the NCAA respectfully requests until June 22, 2015 to submit its response to Nichols' First Objections.

5. Counsel for the NCAA conferred with Co-Lead Counsel for Plaintiffs on June 8, 2015, and with counsel for Nichols on June 9, 2015. Neither Plaintiffs nor counsel for Nichols oppose this motion, and all agree to the requested extension.

6. In light of the above, the NCAA respectfully submits that good cause exists under Fed. R. Civ. P. 6(b)(1) for the requested extension and that this motion is not brought for purposes of delay.

WHEREFORE, the NCAA respectfully requests an extension of time until June 22, 2015 for the submission of its response to Nichols' First Objections. The NCAA further requests whatever other relief the Court deems appropriate.

Dated: June 10, 2015

Respectfully submitted,

/s/ Johanna M. Spellman
Liaison Counsel for Defendant
National Collegiate Athletic Association

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CERTIFICATE OF SERVICE

I, Johanna M. Spellman, certify that on June 10, 2015, a true and correct copy of the foregoing Agreed Motion For An Extension of Time was filed through the ECF system and served upon the following parties by prepaid first class mail:

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